



FILED
8-25-16
02:12 PM

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Refinements, and Establish Annual Local and Flexible Procurement Obligations for the 2016 and 2017 Compliance Years.	R.14-10-010 (Filed October 16, 2014)
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**INTERVENOR COMPENSATION CLAIM OF
THE UTILITY REFORM NETWORK
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF
THE UTILITY REFORM NETWORK**

Intervenor: The Utility Reform Network (TURN)	For contribution to Decisions (D.) 15-06-063 and 16-06-045
Claimed: \$43,365.69	Awarded: \$
Assigned Commissioner: Michel Florio	Assigned ALJ: Kevin Dudney
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).	
Signature:	/s/
Date: 8/25/16	Printed Name: Thomas J. Long

PART I: PROCEDURAL ISSUES (to be completed by Intervenor except where indicated)

A. Brief description of Decision:	Decisions 15-06-063 and 16-06-045 adopt local and flexible capacity obligations for 2016 and 2017, respectively, and address various issues concerning refinements to the Resource Adequacy (RA) program.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	N/A	
2. Other specified date for NOI:	12/5/14	
3. Date NOI filed:	12/5/14	
4. Was the NOI timely filed?		
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	R.14-05-001	
6. Date of ALJ ruling:	9/5/14	
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	R.14-05-001	
10. Date of ALJ ruling:	9/5/14	
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.16-06-045	
14. Date of issuance of Final Order or Decision:	June 23, 2016	
15. File date of compensation request:	August 25, 2016	
16. Was the request for compensation timely?		

C. Additional Comments on Part I (use line reference # as appropriate):

#	Intervenor's Comment(s)	CPUC Discussion

PART II: SUBSTANTIAL CONTRIBUTION (to be completed by Intervenor except where indicated)

- A. Did the Intervenor substantially contribute to the final decision (see § 1802(i), § 1803(a), and D.98-04-059). (For each contribution, support with specific reference to the record.)**

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>1. The Commission agreed with TURN's recommendation to require Southern California Edison (SCE) and Southern California Gas Company (SoCal Gas) to track changes in procurement costs resulting from the shifting of required resources from the LA Basin to the San Diego sub-area made necessary by the catastrophic leak from the Aliso Canyon natural gas storage facility.</p>	<p>TURN Comments on CAISO Local Capacity and Flexible Capacity Requirements Reports (LCR and FCR Comments), May 6, 2016, pp. 3-5.</p> <p>D.16-06-045, pp. 10-12.</p>	
<p>2. In response to concerns raised by TURN, the Commission requested that the CAISO adhere to prescribed guidelines to promote an open and transparent process with respect to local capacity requirements (LCR) and flexible capacity requirements (FCR).</p>	<p>TURN LCR and FCR Comments, May 6, 2016, pp. 1-2.</p> <p>D.16-06-045, pp. 15-17.</p>	
<p>3. TURN presented detailed analysis supporting its contention that, while the Energy Division (ED) has made great progress in developing a proposal for measuring the effective load carrying capacity (ELCC) of wind and solar resources, ED's proposal is not yet ready for adoption, because of, among other things, concerns regarding ED's proposed monthly factors and efforts to increase geographic granularity. The Commission agreed with TURN that ED's</p>	<p>TURN Comments on Track 1 RA Proposals, Jan. 29, 2016, pp. 1-2.</p> <p>Comments of TURN on Track 1 Proposals, April 1, 2016, pp. 2-11.</p> <p>D.16-06-045, pp. 24-26.</p>	

proposal had made great strides, but that issues of the type raised by TURN need more analysis before ED's proposal can be adopted.		
4. TURN took the position that, while SCE's ELCC proposal warranted further consideration, certain elements of the proposal raise concern, including: the validity of the 30 th percentile assumption; whether SCE's proposal meets the statutory ELCC requirement; and the cost impacts of the proposal. The Commission noted TURN's concerns and agreed that, while SCE's proposal merited further consideration, the cost impacts need to be better understood.	Comments of TURN on Track 1 Proposals, April 1, 2016, pp. 11-16. Reply Comments of TURN on Track 1 Proposals, April 8, 2016, pp. 4-5. D.16-06-045, pp. 23, 26.	
5. TURN was the only ratepayer representative to support PG&E's proposed changes to RA policies for "pre-dispatch" resources. The Commission adopted the changes supported by TURN.	Comments of TURN on Track 1 Proposals, April 1, 2016, pp. 16-17. D.16-06-045, pp. 55-56.	
6. TURN supported PG&E's proposal to count the full range of charge and discharge for storage resources, such as pumped storage, with transition times between charging and discharging of less than 45 minutes. The Commission adopted PG&E's changes, over the objection of the CAISO.	Comments of TURN on Proposals at February 9, 2015 Workshop, 2/27/14, p. 3. D.15-06-063, pp. 47-48.	
7. TURN was the only	Comments of TURN on Proposals at	

ratepayer representative to support CAISO's proposal to cap an LSE's LCR at the LSE's system requirement in the monthly RA process. The Commission adopted this proposal over the objection of several parties.	February 9, 2015 Workshop, 2/27/14, pp. 4-5. D.15-06-063, pp. 51-54.	
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?¹	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	
c. If so, provide name of other parties: With respect to certain issues, depending on the issue, one or more of several other parties may have taken a position similar to TURN, including ORA, CLECA, GPI, SDG&E, PG&E, SCE, CAISO and AReM.		
d. Intervenor's claim of non-duplication: TURN and ORA represented similar interests in this proceeding. (While both represented ratepayer interests, TURN alone focuses its representation on the interests of residential and small commercial customers.) TURN accordingly took steps to coordinate with ORA, as appropriate, and as noted in the attached timesheet by the issue code "Coord" for efforts to coordinate. For example, TURN took the lead in analyzing CAISO's LCR and FCR needs assessment for 2016 and 2017 and making recommendations for improving CAISO's process for future assessments. In addition, TURN devoted relatively more resources than ORA to explaining the issues with the ELCC model that necessitated postponing its use for estimating qualifying capacity values for wind and solar resources. The fact that other parties shared TURN's perspective on various other issues did not result in TURN's undue duplication with those parties. A rulemaking proceeding of this nature attracts a range of parties, and some degree of overlap in positions is inevitable. In the specific case of the issues here, the range of interests represented by parties with positions overlapping with TURN's varied widely, from generators to marketers to utilities to consumer representatives. TURN's positions were based on the independent analysis of its highly experienced and respected expert, Kevin Woodruff, and complementary to the offerings of others. TURN's independent		

¹ The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

<p>perspective contributed to a full record upon which the Commission could base its determinations.</p> <p>For all of these reasons, TURN submits that the Commission should find no undue duplication between TURN's participation and that of DRA or other parties</p>	
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C. Additional Comments on Part II (use line reference # or letter as appropriate):

#	Intervenor's Comment	CPUC Discussion

PART III: REASONABLENESS OF REQUESTED COMPENSATION (to be completed by Intervenor except where indicated)

A. General Claim of Reasonableness (§ 1801 and § 1806):

<p>a. Intervenor's claim of cost reasonableness: TURN's advocacy reflected in Decisions 15-06-063 and 16-06-045 addressed policy and implementation matters rather than specific rates or disputes over particular dollar amounts. As a result, TURN cannot easily identify precise monetary benefits to ratepayers from our work related to these decisions, given the nature of the issues presented. While it is difficult to place a dollar value on Resource Adequacy (RA) issues, TURN submits that our participation should result in reduced customer costs by promoting accurate RA needs assessments and cost-effective refinements to the RA program. In this case as in prior RA proceedings, these benefits far exceed the modest cost of TURN's participation. (<i>See, i.e.</i> D.12-06-014, issued in, R.09-10-032, as well as D.09-11-029, issued in R.08-01-025, and D.07-03-011, issued in R.05-12-013 (two earlier RA proceedings), which found that the benefits from TURN's participation on RA policy issues outweighed the costs of TURN's participation.)</p> <p>For all of these reasons, the Commission should find that TURN's efforts here have been productive.</p>	<p>CPUC Discussion</p>
<p>b. Reasonableness of hours claimed: This Request for Compensation includes approximately 140 total substantive hours for TURN's attorney and consultant, or the equivalent of three and one-half weeks of full-time work by a single person (40 hours/week). TURN submits that this is a reasonable amount of time, given that the two phases of the proceeding that resulted in Decisions 15-06-063 and 16-06-045 spanned 22 months, required careful analysis of new ELCC proposals by Energy Division and other parties, required careful scrutiny of several new and complex proposals, involved three workshops, and involved five formal pleadings filed by TURN (excluding</p>	

compensation-related pleadings).

TURN has not included in this request any hours related to the “Track 2” issues concerning a durable flexible capacity program, concerning which the Commission has not yet issued a decision. TURN is reserving those hours for potential claim in a future compensation request.

TURN was efficient in staffing this proceeding and pursuing our objectives. As reflected in the attached timesheets, Mr. Long was TURN’s sole attorney in this phase of the case. Throughout this phase, Mr. Long was assisted by outside consultant Kevin Woodruff, of Woodruff Expert Services, the same expert TURN has extensively relied on in previous Resource Adequacy rulemaking proceedings. Once again, Mr. Long relied heavily on Mr. Woodruff, resulting in Mr. Woodruff’s incurring more than 85% of TURN’s total hours (excluding intervenor compensation-related time). This reliance on Mr. Woodruff’s extensive expertise significantly reduced TURN’s attorney hours and thereby resulted in efficiencies in TURN’s participation in this proceeding.

TURN claims 4.25 hours (approximately 3% of TURN’s total substantive hours, mostly incurred by Kevin Woodruff) for its work analyzing the CAISO’s LCR and FCR studies for the 2016 RA year, addressed in D.15-06-063. The time incurred, including participating in CAISO-organized conference calls, was related to the LCR and FCR issues in this docket, and was devoted to understanding and analyzing the CAISO studies and their results for potential comment to the CPUC. TURN’s analysis included propounding a data request to CAISO regarding its FCR study and results. After reviewing the studies and the data request response, TURN was sufficiently satisfied that the CAISO methodology and estimates were reasonable and did not see a reason to file any comments with the CPUC. Nevertheless, the fact that TURN undertook to scrutinize the CAISO studies and found no problems worth commenting upon could give the Commission confidence that the CAISO studies and results were reliable. In this respect, TURN’s analysis made a substantial contribution to the final decision adopting the CAISO study results, and TURN did so efficiently by incurring a small number of hours and avoiding the filing of an unnecessary pleading with the Commission. Accordingly, TURN submits that these hours are reasonable and should be compensated. (TURN’s work analyzing the CAISO’s FCR and LCR studies for the 2017 RA year is reflected in the first and second substantial contributions listed in Part II. A above.)

TURN submits that all of the hours claimed in this request were reasonably necessary to the achievement of TURN’s substantial contributions, and no unnecessary duplication of effort is reflected in the attached timesheets.

<p>TURN's request also includes 8.0 hours devoted to the preparation of this request for compensation by Mr. Long. This is a reasonable figure consistent with the scale of this two-year proceeding that yielded two substantive decisions and TURN's level of involvement in this proceeding. Mr. Long has prepared this request because of his involvement in both phases of the proceeding and his detailed knowledge of TURN's work effort.</p>															
<p>c. Allocation of hours by issue:</p> <p>TURN has allocated its daily time entries by activity codes to better reflect the nature of the work reflected in each entry. TURN has used the following activity codes for its substantive (non-compensation-related) work:</p> <table border="1" data-bbox="240 730 1055 1354"> <thead> <tr> <th>Code</th><th>Description</th></tr> </thead> <tbody> <tr> <td>RA Revisions</td><td>Work specifically related to proposals to refine certain aspects of the Resource Adequacy program</td></tr> <tr> <td>FCR</td><td>Work specifically related to review and assessment of Flexible Capacity Requirements</td></tr> <tr> <td>ELCC</td><td>Work specifically related to proposed ELCC methodologies for calculating qualifying capacity for wind and solar resources</td></tr> <tr> <td>LCR</td><td>Work specifically related to review and assessment of Local Capacity Requirements</td></tr> <tr> <td>GP</td><td>Work related to general participation in this proceeding, such as reviewing the scoping memo and other rulings, review of workshop notices, and other procedural matters</td></tr> <tr> <td>Comp</td><td>Work related to intervenor compensation.</td></tr> </tbody> </table> <p># - Time entries that cover substantive issue work that cannot easily be identified with a specific activity code. In this proceeding, in recognition of the fact that the workshops and comments often addressed several discrete issues in a relatively short time frame, the time entries coded # represent approximately 6% of the total hours. TURN requests compensation for all of the time included in this request for compensation, and therefore does not believe allocation of the time associated with these entries is necessary. However, if such allocation needs to occur, TURN proposes that the Commission allocate these entries as follows, based on the following percentages derived from the time TURN devoted to the major issues in the docket:</p> <p>ELCC – 48.75 hours – 40.8%</p>	Code	Description	RA Revisions	Work specifically related to proposals to refine certain aspects of the Resource Adequacy program	FCR	Work specifically related to review and assessment of Flexible Capacity Requirements	ELCC	Work specifically related to proposed ELCC methodologies for calculating qualifying capacity for wind and solar resources	LCR	Work specifically related to review and assessment of Local Capacity Requirements	GP	Work related to general participation in this proceeding, such as reviewing the scoping memo and other rulings, review of workshop notices, and other procedural matters	Comp	Work related to intervenor compensation.	
Code	Description														
RA Revisions	Work specifically related to proposals to refine certain aspects of the Resource Adequacy program														
FCR	Work specifically related to review and assessment of Flexible Capacity Requirements														
ELCC	Work specifically related to proposed ELCC methodologies for calculating qualifying capacity for wind and solar resources														
LCR	Work specifically related to review and assessment of Local Capacity Requirements														
GP	Work related to general participation in this proceeding, such as reviewing the scoping memo and other rulings, review of workshop notices, and other procedural matters														
Comp	Work related to intervenor compensation.														

RA Revisions - 37.25 hours – 31.2% LCR – 21.00 hours – 17.5% FCR – 12.50 hours – 10.5% TURN submits that under the circumstances this information should suffice to address the allocation requirement under the Commission’s rules. Should the Commission wish to see additional or different information on this point, TURN requests that the Commission so inform TURN and provide a reasonable opportunity for TURN to supplement this showing accordingly.	
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B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Thomas Long	2014	2.25	\$570	D.15-06-021, p. 28	\$1,282.50			
T. Long	2015	6.00	\$570	Res. ALJ-308	3,420.00			
T. Long	2016	10.25	\$575	Res. ALJ-329	5,893.75			
Kevin Woodruff	2014	0.50	\$250	D.15-05-026, p. 10	\$125			
K. Woodruff	2015	41.00	\$250	Same as 2014	10,250			
K. Woodruff	2016	79.50	\$250	Same as 2015	19,875.00			
Subtotal: \$ 40,846.25						Subtotal: \$		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Subtotal: \$						Subtotal: \$		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
T. Long	2014	0.75	\$285	½ of 2014 rate	\$213.75			
T. Long	2016	8.0	\$287.50	½ of 2016 rate	2,300.00			
Subtotal: \$2,513.75						Subtotal: \$		
COSTS								
#	Item	Detail			Amount	Amount		
	Phone	Telephone expense related to R.1410-010			\$0.31			

	Photocopying	Expenses associated with copying pleadings and other documents related to R.1410-010	\$1.80	
	Postage	Expenses associated with mailing pleadings related to R.110-010	\$3.58	
TOTAL REQUEST: \$43,365.69				TOTAL AWARD: \$
<p>**We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer's normal hourly rate</p>				
ATTORNEY INFORMATION				
	Attorney	Date Admitted to CA BAR²	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
	Thomas Long	12/86	124776	No

C. Attachments Documenting Specific Claim and Comments on Part III (Intervenor completes; attachments not attached to final Decision):

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Daily Time Records for Attorney and Expert
3	Cost/expense Details

D. CPUC Disallowances and Adjustments (CPUC completes):

Item	Reason

PART IV: OPPOSITIONS AND COMMENTS
Within 30 days after service of this Claim, Commission Staff
or any other party may file a response to the Claim (see § 1804(c))

(CPUC completes the remainder of this form)

² This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

A. Opposition: Did any party oppose the Claim?	
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If so:

Party	Reason for Opposition	CPUC Discussion

B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	
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If not:

Party	Comment	CPUC Discussion

FINDINGS OF FACT

1. Intervenor [has/has not] made a substantial contribution to D._____.
2. The requested hourly rates for Intervenor's representatives [,as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [,as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$_____.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. Intervenor is awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay Intervenor the total award. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay Intervenor their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated.”] Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning [date], the 75th day after the filing of Intervenor’s request, and continuing until full payment is made.
3. The comment period for today’s decision [is/is not] waived.
4. This decision is effective today.

Dated _____, at San Francisco, California.

Revised September 2014

Attachment 1

Certificate of Service

(Filed electronically as a separate document pursuant to Rule 1.13(b)(iii))

(Served electronically as a separate document pursuant to Rule 1.10(c))

Revised September 2014

Attachment 2

Attorney Time Sheet Detail

Date	Atty	Case	Task	Description Hours	Time Spent Page 1
<u>Attorney: K Woodruff</u>					
12/3/14	K Woodruff	R14-10-010	GP	Discussed issues in case with client.	0.50
1/6/15	K Woodruff	R14-10-010	GP	Reviewed Scoping Ruling and Energy Division proposals.	0.50
1/8/15	K Woodruff	R14-10-010	RA Revisions	Discussed potential comments and proposals regarding RA issues with client.	0.25
1/9/15	K Woodruff	R14-10-010	RA Revisions	Reviewed Scoping Ruling and Energy Division proposals.	0.50
1/12/15	K Woodruff	R14-10-010	Coord	Communicated with CLECA and ORA regarding potential comments in response to Scoping Ruling.	0.25
1/16/15	K Woodruff	R14-10-010	RA Revisions	Began reviewing parties' comments and proposals.	1.00
1/21/15	K Woodruff	R14-10-010	Coord	Discussed parties' proposals with CLECA and ORA.	0.75
1/22/15	K Woodruff	R14-10-010	RA Revisions	Finished reviewing parties' comments and proposals; reported to client.	2.50
2/6/15	K Woodruff	R14-10-010	RA Revisions	Began reviewing reply comments to parties' opening comments and proposals; began reviewing parties' presentations.	1.25
2/8/15	K Woodruff	R14-10-010	RA Revisions	Reviewed reply comments.	0.75
2/9/15	K Woodruff	R14-10-010	RA Revisions	Prepared for and participated in workshop.	6.50
2/11/15	K Woodruff	R14-10-010	FCR	Began reviewing CAISO materials regarding flexible capacity requirements computation.	0.25
2/12/15	K Woodruff	R14-10-010	FCR	Listened to portion of CAISO call reviewing Flexible Capacity Requirements computation; communicated with ORA regarding issues (P.Spencer).	0.50
2/17/15	K Woodruff	R14-10-010	RA Revisions	Prepared outline of potential comments for client.	0.50
2/18/15	K Woodruff	R14-10-010	RA Revisions	Began preparing draft comments.	1.00
2/19/15	K Woodruff	R14-10-010	RA Revisions	Continued drafting comments.	1.00
2/20/15	K Woodruff	R14-10-010	RA Revisions	Continued drafting comments.	0.25
2/25/15	K Woodruff	R14-10-010	RA Revisions	Continued drafting comments.	3.00
2/26/15	K Woodruff	R14-10-010	RA Revisions	Completed draft comments; sent to client.	0.50
3/4/15	K Woodruff	R14-10-010	RA Revisions	Reviewed parties' comments on workshop proposals; communicated with client regarding potential reply comments.	1.50
4/10/15	K Woodruff	R14-10-010	FCR	Prepared data request for CAISO regarding flexible capacity requirements estimates.	0.50
4/14/15	K Woodruff	R14-10-010	LCR	Participated in CAISO call regarding 2016 Local Capacity Requirements; reported to client.	0.75

Date	Atty	Case	Task	Description Hours	Time Spent Page 2
4/15/15	K Woodruff	R14-10-010	FCR	Participated in CAISO call regarding 2016 Flexible Capacity Requirements; reported to client.	1.50
5/1/15	K Woodruff	R14-10-010	FCR	Reviewed CAISO final Flexible Capacity Requirements filing; reported to client	0.25
5/8/15	K Woodruff	R14-10-010	FCR	Began reviewing CAISO response to TURN data request on flexible capacity.	0.25
5/11/15	K Woodruff	R14-10-010	FCR	Continued reviewing CAISO response to TURN data request on flexible capacity requirements; reported to client.	0.25
5/27/15	K Woodruff	R14-10-010	GP	Began reviewing Proposed Decision.	1.00
6/1/15	K Woodruff	R14-10-010	GP	Reviewed Proposed Decision; reported to client.	0.75
6/15/15	K Woodruff	R14-10-010	RA Revisions	Reviewed parties' comments on Proposed Decision.	0.50
7/9/15	K Woodruff	R14-10-010	ELCC	Began reviewing ED's draft ELCC study.	0.25
7/13/15	K Woodruff	R14-10-010	ELCC	Continued reviewing ED's draft ELCC study.	1.25
8/17/15	K Woodruff	R14-10-010	ELCC	Continued reviewing ED's ELCC report.	1.50
8/17/15	K Woodruff	R14-10-010	ELCC	Continued reviewing ED's ELCC report.	0.75
8/19/15	K Woodruff	R14-10-010	ELCC	Completed reviewing ED's ELCC report.	0.75
8/20/15	K Woodruff	R14-10-010	ELCC	Participated in workshop on ED's ELCC report.	2.50
8/21/15	K Woodruff	R14-10-010	ELCC	Reported to client on workshop regarding ED's ELCC report.	0.25
8/28/15	K Woodruff	R14-10-010	ELCC	Sent ED (D.Brooks) comment on draft report and request for data.	0.25
10/7/15	K Woodruff	R14-10-010	RA Revisions	Reviewed CAISO market notices regarding potential changes to CPUC's Resource Adequacy program; reported to client.	0.25
10/28/15	K Woodruff	R14-10-010	LCR	Reviewed CAISO materials regarding its Local Capacity Requirements study.	0.25
10/29/15	K Woodruff	R14-10-010	LCR	Participated in CAISO call regarding LCR study process; reported to client.	0.75
11/13/15	K Woodruff	R14-10-010	RA Revisions	Reviewed CAISO proposal for altering RA rules; communicated with client.	0.25
11/18/15	K Woodruff	R14-10-010	GP	Reviewed ALJ Ruling setting Prehearing Conference; reported to client.	0.25
11/19/15	K Woodruff	R14-10-010	LCR	Reviewed CAISO notice regarding insufficiency of local and TAC area RA capacity for 2016; communicated with client.	0.25
12/3/15	K Woodruff	R14-10-010	#	Reviewed parties' Prehearing Conference statements; discussed issues and schedule with client.	2.00

Date	8/11/2016 Atty 2:22 PM	Case	Task	Description Hours	Time Spent Page 3
12/9/15	K Woodruff	R14-10-010	#	Reviewed PHC transcript; communicated with client.	0.50
12/23/15	K Woodruff	R14-10-010	GP	Reviewed Assigned Commissioner Ruling; reported to client regarding scope and schedule.	0.50
1/15/16	K Woodruff	R14-10-010	RA Revisions	Began reviewing Energy Division and other parties' RA proposals.	0.50
1/19/16	K Woodruff	R14-10-010	RA Revisions	Continued reviewing ED and other RA proposals.	3.00
1/20/16	K Woodruff	R14-10-010	RA Revisions	Continued reviewing ED and other RA proposals.	0.50
1/21/16	K Woodruff	R14-10-010	RA Revisions	Continued reviewing ED and other RA proposals; prepared summary of proposals and suggested TURN comments; sent to client.	3.25
1/26/16	K Woodruff	R14-10-010	ELCC	Began writing comments on parties' and ED proposals.	1.25
1/27/16	K Woodruff	R14-10-010	ELCC	Continued writing comments on parties' and ED proposals.	1.75
1/28/16	K Woodruff	R14-10-010	ELCC	Completed draft comments; sent to client; discussed with client; reviewed final version of comments.	2.00
1/29/16	K Woodruff	R14-10-010	RA Revisions	Reviewed other parties comments on other parties' and ED proposals.	1.00
2/17/16	K Woodruff	R14-10-010	RA Revisions	Reviewed materials for 2/18 workshop.	0.25
2/18/16	K Woodruff	R14-10-010	ELCC	Prepared for and participated in workshop regarding ELCC; reported to client.	2.00
2/18/16	K Woodruff	R14-10-010	RA Revisions	Prepared for and participated in workshop regarding RA revisions (other than ELCC); reported to client.	5.00
2/29/16	K Woodruff	R14-10-010	LCR	Reviewed CAISO Market Notice and related materials regarding 2017 Local Capacity Requirements study.	0.25
3/17/16	K Woodruff	R14-10-010	LCR	Reviewed CAISO Local Capacity Requirements study; communicated with client and ORA (P.Spencer,N.Rogers).	1.50
3/21/16	K Woodruff	R14-10-010	LCR	Discussed CAISO LCR study with CAISO staff (C.Micsa).	0.25
3/25/16	K Woodruff	R14-10-010	ELCC	Began reviewing ED and parties' revised proposals.	0.50
3/28/16	K Woodruff	R14-10-010	ELCC	Began preparing comments on ED and parties' proposals.	5.00

Date	8/11/2016 Atty 2:22 PM	Case	Task	Description Hours	Time Spent Page 4
3/29/16	K Woodruff	R14-10-010	ELCC	Discussed potential comments with client; continued preparing comments; analyzed SCE's alternate reliability modeling.	5.50
3/31/16	K Woodruff	R14-10-010	ELCC	Completed draft comments; sent to client.	7.00
4/1/16	K Woodruff	R14-10-010	ELCC	Completed comments on Track 1 issues; began reviewing other parties' comments.	3.75
4/4/16	K Woodruff	R14-10-010	ELCC	Reviewed parties' Track 1 comments; outlined potential reply comments for client.	3.25
4/6/16	K Woodruff	R14-10-010	ELCC	Began preparing reply comments.	4.25
4/7/16	K Woodruff	R14-10-010	ELCC	Completed draft reply comments; sent to client; revised final reply comments.	3.00
4/8/16	K Woodruff	R14-10-010	ELCC	Reviewed parties' reply comments.	0.25
4/11/16	K Woodruff	R14-10-010	LCR	Began reviewing CAISO's final local capacity requirements study.	1.00
4/12/16	K Woodruff	R14-10-010	LCR	Continued reviewing CAISO's final LCR study; communicated with other parties (ORA,N.Rogers,P.Spencer; Sierra Club,M.Vespa; CLECA,B.Barkovich).	2.00
4/13/16	K Woodruff	R14-10-010	FCR	Reviewed CAISO's flexible capacity requirements study.	1.25
4/14/16	K Woodruff	R14-10-010	LCR	Participated in CAISO's LCR study call; communicated with client and Sierra Club (M.Vespa).	2.50
4/18/16	K Woodruff	R14-10-010	FCR	Participated in CAISO's call regarding Flexible Capacity Requirements.	1.75
4/19/16	K Woodruff	R14-10-010	LCR/FCR	Communicated with client and other parties regarding CAISO LCR and FCR study assumptions (CLECA,B.Barkovich; ORA,P.Spencer).	0.50
4/26/16	K Woodruff	R14-10-010	LCR	Reviewed CAISO request for possible schedule adjustment; reported to client; reviewed results of LCR study.	0.25
4/29/16	K Woodruff	R14-10-010	LCR/FCR	Began reviewing CAISO's revised final local capacity requirements and flexible capacity requirements studies.	0.75
4/30/16	K Woodruff	R14-10-010	LCR/FCR	Began preparing comments on CAISO's final LCR and FCR studies.	2.25
5/2/16	K Woodruff	R14-10-010	LCR/FCR	Prepared comments on CAISO final Local Capacity and Flexible Capacity Requirements studies.	3.00
5/4/16	K Woodruff	R14-10-010	LCR/FCR	Discussed draft comments with client; edited draft comments; resent to client.	1.75

Date	8/11/2016 Atty 2:22 PM	Case	Task	Description Hours	Time Spent Page 5
5/7/16	K Woodruff	R14-10-010	LCR/FCR	Reviewed parties' comments on CAISO LCR and FCR studies; commented to client.	0.25
5/20/16	K Woodruff	R14-10-010	#	Began reviewing Proposed Decision; reported to client.	0.25
5/31/16	K Woodruff	R14-10-010	GP	Reviewed Proposed Decision; reported to client regarding potential comments.	2.00
6/3/16	K Woodruff	R14-10-010	#	Discussed RA PD with other parties (ORA,P.Spencer;CLECA,B.Barkovich); prepared comments on PD; sent to client.	1.75
6/9/16	K Woodruff	R14-10-010	LCR	Reviewed parties' comments on PD; researched SDG&E's comments; commented to client.	1.00
6/13/16	K Woodruff	R14-10-010	LCR	Prepared reply comments on PD; sent to client.	2.00
6/14/16	K Woodruff	R14-10-010	LCR	Reviewed and commented on client's edits.	0.25

Total: K Woodruff

121.00

Attorney: TL

11/10/14	TL	R14-10-010	GP	Initial review of OIR	0.25
12/3/14	TL	R14-10-010	GP	Ph call w/KW re TURN likely participation on issues in OIR	0.50
12/3/14	TL	R14-10-010	GP	Rev OIR (0.25) and initial review of certain party cmts on OIR	0.50
12/4/14	TL	R14-10-010	Comp	Prep NOI	0.75
12/17/14	TL	R14-10-010	GP	Attend PHC	0.75
12/18/14	TL	R14-10-010	GP	Prep e-mail to KW re results of PHC	0.25
1/8/15	TL	R14-10-010	GP	Ph call w/KW re deciding TURN's participation re 1/16 and 1/30 comment opportunities	0.50
2/26/15	TL	R14-10-010	RA Revisions	Rev and edit KW draft comments on workshop proposals	0.75
4/8/15	TL	R14-10-010	GP	Research re TURN's party status and prep email to ALJ re same	0.25
4/10/15	TL	R14-10-010	FCR	Rev and edit KW draft DR to CAISO re needs assessment	0.25
12/2/15	TL	R14-10-010	GP	Review PHC statements of 14 parties	1.25
12/3/15	TL	R14-10-010	#	Discuss w/KW issues raised in PHC statements and TURN's positions for PHC	1.00
12/6/15	TL	R14-10-010	#	Prep for PHC	0.25
12/6/15	TL	R14-10-010	GP	Rev 6/15 final decision to prep for PHC	0.75
12/7/15	TL	R14-10-010	#	Attend PHC	1.00
1/4/16	TL	R14-10-010	GP	Rev Ph. 2 scoping ruling	0.25
1/21/16	TL	R14-10-010	#	Exchange emails w/KW re what issues to cover in comments	0.25

Date	8/11/2016 Atty 2:22 PM	Case	Task	Description Hours	Time Spent Page 6
1/21/16	TL	R14-10-010	#	Rev KW summary and analysis of Ph 1 proposals and potential points for comments	0.50
1/28/16	TL	R14-10-010	ELCC	Rev and edit KW draft cmts re ELCC methodology and discuss same w/KW	0.50
3/17/16	TL	R14-10-010	LCR	Rev and respond to KW email re preliminary CAISO LCR findings	0.25
3/29/16	TL	R14-10-010	ELCC	Ph call w/KW re discussing TURN position for cmts on ELCC modeling	0.75
3/29/16	TL	R14-10-010	ELCC	Rev KW analysis of ELCC issues	0.25
3/29/16	TL	R14-10-010	RA Revisions	Rev KW analysis of other RA issues for potential TURN cmts	0.25
3/31/16	TL	R14-10-010	ELCC	Exchange emails w/KW re KW's updated analysis re ED model	0.25
3/31/16	TL	R14-10-010	RA Revisions	Rev and edit KW draft opening cmts on Track 1 RA issues	1.25
4/1/16	TL	R14-10-010	#	Rev and edit KW revised draft of open cmts	0.50
4/6/16	TL	R14-10-010	LCR/FCR	Exchange emails w/KW re delay in CAISO LCR data and analysis	0.25
4/7/16	TL	R14-10-010	LCR/FCR	Rev and edit KW draft reply cmts	0.50
4/7/16	TL	R14-10-010	LCR/FCR	Rev and edit KW revised draft of reply cmts	0.75
4/18/16	TL	R14-10-010	LCR/FCR	Exchange emails w/KW re potential cmts to CPUC re CAISO problems w/LCR analysis	0.25
5/4/16	TL	R14-10-010	LCR/FCR	Rev and edit KW revised draft cmts	0.50
5/4/16	TL	R14-10-010	LCR	Rev and edit KW draft cmts re LCR and FCR studies (1.5) and ph call w/KW re same	2.00
6/6/16	TL	R14-10-010	#	Rev and edit KW draft cmts on PD	0.25
6/13/16	TL	R14-10-010	LCR/FCR	Rev and edit KW draft reply cmts	0.75
8/17/16	TL	R14-10-010	Comp	Prep comp request	1.25
8/19/16	TL	R14-10-010	Comp	Prep comp request	1.75
8/22/16	TL	R14-10-010	Comp	Prep comp request	2.50
8/23/16	TL	R14-10-010	Comp	Prep comp request	2.00
8/25/16	TL	R14-10-010	Comp	Prep comp request	0.50
Total: TL					27.25
Grand Total					148.25

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Attachment 3

Expense Detail

Date	8/11/2016 4:56 PM	Case	Task	Description	Expenses.- Select Activitiy	Amount
						Page 1
Activity: \$Copies						
12/5/14	R14-10-010	\$Copies		Copies of Notice of Intent to Claim Intervenor Compensation sent to ALJ		\$0.70
2/27/15	R14-10-010	\$Copies		Copy Of Comments Of TURN On Proposals Presented At February 9, 2015 Workshop To Send To ALJ		\$0.60
1/29/16	R14-10-010	\$Copies		Copy of Comments of TURN on track 1 resource adequacy proposals to send to the ALJ - 5 pages at \$0.10 per page		\$0.50
Total: \$Copies						\$1.80
Activity: \$Phone						
7/31/15	R14-10-010	\$Phone		7/31/2015 Phone Bill		\$0.31
Total: \$Phone						\$0.31
Activity: \$Postage						
12/5/14	R14-10-010	\$Postage		Postage for Notice of Intent to Claim Intervenor Compensation sent to ALJ		\$1.19
2/27/15	R14-10-010	\$Postage		Postage To Mail Comments Of TURN On The Proposals Presented At February 9, 2015 Workshop To Mail To ALJ		\$1.19
1/29/16	R14-10-010	\$Postage		Postage to mail comments of TURN on track 1 resource adequacy issues to send to the ALJ		\$1.20
Total: \$Postage						\$3.58
Grand Total						\$5.69

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Attachment 4

TURN Hours Allocated by Issue

R.14-10-010
ATTORNEYS AND CONSULTANTS

Total Substantive Hours	Total Compensation (non-travel, non-comp)	
	2.25	\$1,282.50
5	6.00	\$3,420.00
5	10.25	\$5,893.75
	0.50	\$125.00
5	41.00	\$10,250.00
5	79.50	\$19,875.00
	139.50	\$40,846.25
%	100.00%	
Comp-related		\$2,513.75
Expenses		\$5.69
Total		\$43,365.69